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5 | *Lead Counsel for the New York City Pension Funds*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

12 | In re JUNIPER NETWORKS, INC. SECURITIES
LITIGATION

No. C06-04327-JW

This Document Relates to:

**STIPULATION AND [PROPOSED]
ORDER WITHDRAWING AS MOOT
LEAD PLAINTIFF'S MOTION TO
COMPEL JUNIPER TO PRODUCE
DRAFTS OF SEC FILINGS**

All Actions

DATE: April 14, 2009
TIME: 10:00 a.m.
BEFORE: Hon. Patricia V. Trumbull

28 STIPULATION WITHDRAWING AS MOOT LEAD PLAINTIFF'S MOTION TO COMPEL JUNIPER TO PRODUCE
DRAFTS OF SEC FILINGS -- CASE NO. C06-04327

1 This Stipulation is entered into by and among Lead Plaintiff the New York City Pension
2 Funds, and defendant Juniper Networks, Inc. (“Juniper”), by and through their respective
3 attorneys of record.

4 **WHEREAS**, pursuant to the Court's Order dated March 12, 2009, the hearing on Lead
5 Plaintiff's Motion to Compel Juniper to Produce Drafts of SEC Filings and Other Non-Privileged
6 Documents and an Accompanying Privilege Log is scheduled for April 14, 2009 at 10:00 a.m.
7 and Lead Plaintiff's Reply Memorandum of Law in Support thereof is due on March 31, 2009;
8 and

9 **WHEREAS**, in the interest of judicial economy, the parties have further met and
10 conferred;

11 **NOW, THEREFORE**, Lead Plaintiff withdraws its Motion to Compel (Docket No.
12 228), and the parties stipulate, and request the Court to order, that the hearing scheduled for
13 April 14, 2009 on the Motion to Compel be vacated.

15 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED: April 6, 2009

BARBARA J. HART
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/s/
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4 /s/
5

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11 NINA F. LOCKER
12 STEVEN GUGGENHEIM
13 JONI OSTLER
14 WILSON SONSINI GOODRICH & ROSATI
15 Professional Corporation

16 /s/
17

18 Joni Ostler
19 650 Page Mill Road
20 Palo Alto, CA 94304-1050
21 Telephone: 650-493-9300

22 Counsel for Defendant Juniper Networks, Inc.,

23 **ATTESTATION PURSUANT TO GENERAL ORDER 45**

24 I, Willem F Jonckheer, am the ECF User whose identification and password are being
25 used to file this Stipulation Withdrawing as Moot Lead Plaintiff's Motion to Compel Juniper to
26 Produce Drafts of SEC Filings. I hereby attest that concurrence in the filing of this document
27 along with the concurrently lodged proposed order has been obtained from the other signatory.

28 Dated: April 6, 2009

SCHUBERT JONCKHEER KOLBE & KRALOWEC LLP

29 By: _____ /s/
30 Willem F. Jonckheer

31 Local Counsel for Lead Plaintiff

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 4/7/09

Patricia V. Trumbull
Hon. Patricia V. Trumbull
United States Magistrate Judge